

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

A.P. MØLLER-MAERSK A/S, TRADING :
AS MAERSK LINE and MAERSK LINE A/S :

Plaintiffs :

CASE NO. 1:17-cv-01355
(NRB) (JLC)

-against- :

SAMRAT CONTAINER LINES, INC., :
Defendant :

UNOPPOSED MOTION
FOR LEAVE TO AMEND
COMPLAINT

-against- :

SAFEWATER LINES (I) PVT. LTD. and :
SAFEWATER LINES INDIA PVT. LTD. :
Third-Party Defendants :

PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO AMEND COMPLAINT

TO THE COURT:

Pursuant to Rule 15(2) of the Federal Rules of Civil Procedure, Plaintiffs A.P. Møller - Maersk A/S, trading as Maersk Line and Maersk Line A/S ("Maersk") file their Unopposed Motion for Leave to Amend Complaint to add a contractual indemnity claim against Samrat Container Lines, Inc. ("Samrat") under the bills of lading that apply to the invoices sued upon by Maersk in this lawsuit, and respectfully would show as follows:

I.

This case was transferred to this Court from the United States District Court for the Southern District of Texas, Houston Division in February of 2017. On April 7, 2017, this Court signed a Joint Scheduling Order that provided in part that no additional causes of action may be asserted against current parties to the lawsuit after May 4, 2017. Plaintiffs seeks leave to amend their Complaint to assert a contractual indemnity claim under the bill of lading terms and conditions that apply to the shipments for which the invoices addressed to Samrat were issued.

Given that this motion is being filed on May 4, 2017, it is timely. A copy of the proposed First Amended Complaint is attached hereto as Exhibit A. This motion is unopposed.

WHEREFORE, PREMISES CONSIDERED, Plaintiff A.P. Møller - Maersk A/S, trading as Maersk Line and Maersk Line A/s respectfully request that this motion be in all respects granted, and that they be allowed to file their First Amended Complaint adding a claim for contractual indemnity.

Respectfully submitted,

By: /s/ Richard L. Gorman
Richard L. Gorman
State Bar No. 00784155
Fed. I.D. 15685
12335 Kingsride Lane #354
Houston, Texas 77024
Telephone: (832) 725-4026
Facsimile: (713) 239-1020
Email: rg@richardgormanlaw.com
Attorney-in-Charge for Plaintiffs

OF COUNSEL:

RICHARD GORMAN LAW

CERTIFICATE OF CONFERENCE

I certify that I exchanged emails with counsel for Samrat Container Lines, Inc., and this motion is unopposed.

/s/ Richard L. Gorman
Of Richard Gorman Law

CERTIFICATE OF SERVICE

I certify that on this 4th day of May, 2017, a true and correct copy of this pleading was served on counsel of record *Via Notice of Electronic Filing*.

/s/ Richard L. Gorman

Of Richard Gorman Law

01795.Unopposed.Motion.Amend.05.04.17